

WISHA Interim Interpretive Memorandum
Washington Department of Labor and Industries
#97-7-E
RESPIRATOR SELECTION SPECIFICATIONS FOR FIRE FIGHTERS

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Background

The current language in WAC 296-305-04001(10)(a) appears to prohibit use of positive-pressure, air-line respirators equipped with a five-minute auxiliary air supply when airborne contaminant levels may exceed an "Immediately Dangerous to Life and Health" (IDLH) limit. This is in conflict with WAC 296-305-04001(13) and is inconsistent with current respirator selection specifications established in health standards which allow these types of respirators to be used as the only potential alternative to a Self-Contained-Breathing-Apparatus (SCBA) during activities involving confined space entry or emergency response. The difference between use of SCBA and such air-line respirators with a five-minute auxiliary air supply can legitimately be described as *de minimis* in most circumstances.

WAC 296-305-04001(10) was intended to prohibit the use of such positive-pressure, air-line respirators as an alternative to SCBAs during interior structural fire fighting activities and was not intended to apply to other fire fighter activities (for example, confined spaces) where "hazardous atmospheres" (IDLH, or non-IDLH but over-the-PEL) may be encountered.

Respirator selection for tasks not involving structural fire fighting or confined space work may rely upon current respirator selection requirements in the general standard on respiratory protection, WAC 296-62-071; or, if applicable, the selection requirements found in the asbestos standard, WAC 296-62-077 (as referenced in WAC 296-305-04001(4)).

This interim memorandum will remain in effect until more formal policy guidance can be provided or until the language of WAC 296-305-04001 can be clarified.

Policy

1. WISHA consultation and compliance staff must cite employers for violations of WAC 296-305-04001(10) whenever respirators other than positive-pressure SCBAs are selected and/or used for interior structural fire fighting activities.
2. WISHA consultation and compliance staff must not cite employers for selection and use of positive-pressure, air-line respirators equipped with an auxiliary self-contained air supply as an alternative to SCBA use in "hazardous atmospheres" if activities do *not* involve interior structural fire fighting. In such circumstances, any technical violation of the language of the standard must be considered *de minimis* and therefore not cited.